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August 25, 2015

Ms. Sarah Juris  
Senior Campaign Finance Analyst  
Federal Election Commission

Dear Ms. Juris,

Thank you for your Request for Additional Information dated August 20, 2015 regarding the committee's Mid-Year Report (01/01/2015 - 06/30/2015).

You asked for additional information regarding procedures used for requesting individual identification, occupation and name of employer information from donors who contribute in excess of \$200 in a calendar year.

Our committee requests that every contributor provide their full name, mailing address, occupation and name of employer. This information is requested in a clear and conspicuous matter on the contribution form, along with a statement indicating that federal law requires that we obtain and report this information.

As you noted in your letter, the committee's report contained incomplete or insufficient information for some individuals, such as initials for their first name or occupation/employer information like "M.a.G./Rs. Vp" or "Self/owner." We take our reporting obligations seriously, and have only reported incomplete information for those individual contributors who failed to provide their complete information

The committee has a procedure for requesting complete information when incomplete or insufficient information is provided by contributors who donate in excess of \$200 in a calendar year. We send those contributors a letter by US Mail that (a) reminds the contributor that federal law requires the committee report their full name, address, occupation and employer and (b) requests the contributor provide the legally required information. The letter is limited to the topic of requesting the legally required information and does not solicit a contribution. This letter is accompanied by a form and return envelope that the contributor can use to easily submit the legally required information to the committee.

This follow up letter requesting additional information is sometimes successful in obtaining more complete information. However, there is often no reply to the letter. In such cases where incomplete or insufficient information has been provided by the contributor, and no response is made to our follow up letter, we report the information that we do have, such as a first name initial, or incomplete occupation/employer information such as "Self/owner."

I am pleased that, between the request for information on the initial solicitation form and the follow-up letter to contributors who initially provide incomplete information, the committee is able to obtain and report complete information for the vast majority of contributors. However, our goal is to report 100% complete information on all individuals who contribute in excess of \$200 in a calendar year. We will review our process to see if any improvements can be made in obtaining complete information.

Regarding your request for additional information about the expenditures reported on Schedule B of the committee's Mid-Year Report, none of those expenditures were for public communications (as defined by 11 CFR 100.26) containing express advocacy as defined under 11 CFR 100.22. No portion of those expenditures were made on behalf of, in support of, or in opposition to any specifically identified candidate, nor did any portion of these expenditures expressly advocate the election or defeat of any candidate. To provide additional clarity in future reports, we will likely add "miscellaneous text" with further information when reporting certain expenditures.

Thank you again for your letter. We are committed to full public disclosure of our election campaign finances and to

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submitting accurate reports. We appreciate the opportunity to provide additional information to the Commission. If you have any questions, or any suggestions for how we can improve our reporting, please contact me.

Sincerely,

Ann Mattson  
Treasurer  
National Campaign

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